

1 ALSTON & BIRD, LLP
DIANE C. STANFIELD (CA Bar No. 106366)
2 DOUGLAS J. HARRIS (CA Bar No. 329946)
diane.stanfield@alston.com
3 douglas.harris@alston.com
333 S. Hope Street 16th Floor
4 Los Angeles, California 90071
Telephone: 213.576.1000
5 Facsimile: 213.576.1100

6 Attorneys for
Fulcrum Credit Partners LLC

7 DOWNEY BRAND LLP
8 JAMIE P. DREHER (CA Bar No. 209380)
Email: jdreher@downeybrand.com
9 TYLER J. HORN (CA Bar No. 323982)
Email: thorn@downeybrand.com
10 621 Capitol Mall, 18th Floor
Sacramento, California 95814
11 Telephone: 916.444.1000
Facsimile: 916.444.2100

12 Attorneys for
13 Tuscan Ridge Associates, LLC

14 UNITED STATES BANKRUPTCY COURT
15 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
16

17 In re
18 PG&E Corporation,
19 and
20 PACIFIC GAS AND ELECTRIC
COMPANY,
21 Debtors.
22

Case No. 19-30088-DM

Chapter 11
Lead Case, Jointly Administered

**NOTICE OF HEARING ON MOTION
FOR RELIEF FROM OR
MODIFICATION OF PLAN
INJUNCTION, TO COMPEL
ARBITRATION AND/OR FOR
ABSTENTION**

23 ☐ Affects PG&E Corporation
24 ☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

25 *All papers shall be filed in the Lead Case,
26 No. 19-30088-DM,
27
28

Date: September 14, 2021
Time: 10:00 a.m.
Crtrm.: Courtroom 17
450 Golden Gate Avenue
San Francisco, CA 94102
Judge: Hon. Dennis Montali

Objection deadline: August 31, 2021

1 TO DEBTORS, THE UNITED STATES TRUSTEE, AND OTHER INTERESTED
2 PARTIES:

3 PLEASE TAKE NOTICE that a hearing on the MOTION FOR RELIEF FROM OR
4 MODIFICATION OF PLAN INJUNCTION, TO COMPEL ARBITRATION AND/OR FOR
5 ABSTENTION (“Motion”) filed by Fulcrum Credit Partners, LLC (“Fulcrum”) will be heard by
6 the Honorable Dennis Montali on **September 14, 2021 at 10:00 a.m.**

7 The hearing will not be conducted in the presiding judge’s courtroom but instead will be
8 conducted by telephone or video. All interested parties should consult the Bankruptcy Court’s
9 website at www.canb.uscourts.gov for information about court operations during the COVID-19
10 pandemic. The Bankruptcy Court’s website provides information regarding how to arrange a
11 telephonic or video appearance. If you have any questions regarding how to appear at a court
12 hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live
13 Chat feature on the Bankruptcy Court’s website.

14 In the Motion, Fulcrum requests that the Bankruptcy Court grant relief from or
15 modification to Sections 10.5 and 10.6 of the Debtors’ and Shareholder Proponents Joint Plan of
16 Chapter 11 Reorganization Dated March 16, 2020 [Docket No. 6320] (as thereafter amended on
17 May 22, 2020 [Docket No. 7521], June 19, 2020 [Docket No. 8048], (the “**Plan**”) and Paragraphs
18 51 and 52 of this Court’s Order dated June 20, 2020 [Dkt. No. 8053] (the “**Plan Injunction**”) and
19 compel arbitration in accordance with the express written agreement of the parties or, and in the
20 alternative, that the Court abstain from the proceedings relating to the claims at issues. Fulcrum’s
21 claims arise out of a pre-petition contractual dispute with Pacific Gas & Electric Company, which
22 the Parties contractually agreed to arbitrate.

23 The Motion is brought pursuant to 28 USC § 1334(c)(1) and 11 USC § 362(d)(1) for cause.
24 The Motion is based on this Notice, the Motion, the Declaration of Scott Bates filed in support of
25 the Motion and upon all other pleadings and papers on file herein and such oral and documentary
26 evidence as may be presented at the hearing on the Motion.

27 PLEASE TAKE FURTHER NOTICE that any opposition or response to the Motion must
28 be in writing, filed with the Bankruptcy Court, and served on the counsel for Fulcrum at the

1 above-referenced address so as to be received by **no later August 31, 2021**. Any relief requested
2 in the Motion may be granted without a hearing if no opposition is filed and served in accordance
3 with the Case Management Order. In deciding the Motion, the Court may consider any other
4 document filed in these Chapter 11 Cases and related Adversary Proceedings.

5 PLEASE TAKE FURTHER NOTICE that copies of the Motion and its supporting papers
6 can be viewed and/or obtained: (i) by accessing the Court's website at www.canb.uscourts.gov, (ii)
7 by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA
8 94102, or (iii) from the Debtor's notice and claims agent, Prime Clerk LLC, at
9 <https://restrucuring.primeclerk.com/pge> or by calling (844) 339-4217 for U.S. based parties; or
10 (929) 333-8977 for International parties or by email at: pgeinfo@primeclerk.com. Note that a
11 PACER password is needed to access documents on the Bankruptcy Court's website.

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13 DATED: August 17, 2021

ALSTON & BIRD, LLP

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15 By: /s/ Diane C. Stanfield

DIANE STANFIELD

Attorneys for Fulcrum Credit Partners, LLC
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